

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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AMERICAN CIVIL LIBERTIES UNION, et al., :  
: Plaintiffs, :  
: :  
v. : Civ. Act. No. 98-CV-5591  
: ALBERTO R. GONZALES, in his official capacity as :  
ATTORNEY GENERAL OF THE UNITED STATES, :  
: Defendant. :  
: :  
-----x

**PLAINTIFFS' MOTION TO FILE DOCUMENTS UNDER  
SEAL PURSUANT TO PROTECTIVE ORDER**

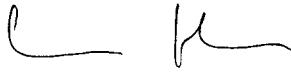
Pursuant to Local Rule 5.1.5(a)(2), plaintiffs, through undersigned counsel, move to file documents under seal pursuant to paragraph 8 of the Agreed Protective Order (Doc. 202). Plaintiffs move to file Plaintiffs' Motion To Designate Deposition Testimony Pursuant To Federal Rule Of Civil Procedure 32 under seal because both the memorandum in support of Plaintiffs' motion and the exhibits refer to and cite material that have been designated subject to the Agreed Protective Order. Pursuant to the Protective Order, Plaintiffs will file a redacted version of this motion shortly.

**CONCLUSION**

For the reasons set forth above, the Court should grant Plaintiffs unopposed motion to file documents under seal.

Dated: October 3, 2006

Respectfully submitted,



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